

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

Criminal No. *3:21cr35 HTW-LGI*

ERROL JOHN, II

18 U.S.C. § 111

18 U.S.C. § 922 (g)(3)

The Grand Jury charges:

COUNT 1

That on or about November 23, 2020, in Leake County in the Northern Division of the Southern District of Mississippi, on lands within the confines of the Red Water Community of the Choctaw Indian Reservation in the Indian Country, the defendant, **ERROL JOHN, II.**, did forcibly assault, resist, oppose, impede, intimidate, and interfere with Maverick Williams, a law enforcement officer employed by the Mississippi Band of Choctaw Indians Police Department, pursuant to a contract between the Mississippi Band of Choctaw Indians and the Department of the Interior, Bureau of Indian Affairs, granting authority under Title 25, United States Code, Section 2804 to perform law enforcement functions, while said officer was engaged in the performance of his official duties, and in the commission of these acts did use a deadly weapon, to wit: a .410 break-action single shot shotgun.

In violation of Title 18, United States Code, Section 111(a)(1) and (b).

COUNT 2

On or about November 23, 2020, in Leake County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **ERROL JOHN, II.**, having knowledge that he was an unlawful user of any controlled substance as defined in Title 21,

United States Code, Section 802, did knowingly possess a firearm, which had been previously shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or in directly from the offense, and all property used to facilitate the offenses.

The grand jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of one or more of the offenses alleged in this indictment:


- (1) Savage Arms Company (Stevens), Model 15 .22 caliber short, bolt action rifle, bearing no serial number; and**
- (2) Savage Arms Company Springfield MOD 944 Series A, 410 break-action, single-shot shotgun bearing serial number P861388, and**
- (3) Any ammunition seized.**

Further, if any of the property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States, to seek a

judgment of forfeiture of any other property of the defendant, up to the value of the property described above.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury


DARREN J. LAMARCA
Acting United States Attorney

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 14th day of April, 2021.


UNITED STATES MAGISTRATE JUDGE